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October 3, 2017

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Joint Petition of Berkeley Electric Cooperative, Inc. and South Carolina Electric & Gas Company for the Reassignment of Territory in Dorchester County and Approval of an Agreement to Limit Corridor Rights
Docket No. 2017-____-E

Dear Ms. Boyd:

Enclosed for filing on behalf of Berkeley Electric Cooperative, Inc. and South Carolina Electric & Gas Company is a Joint Petition for the Reassignment of Territory in Dorchester County and Approval of an Agreement to Limit Corridor Rights.

By copy of this letter, we are serving a copy of the Joint Petition on the South Carolina Office of Regulatory Staff and enclose a certificate of service to that effect.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

Matthew W. Gissendanner

MWG/kms
Enclosures

cc: Dawn Hipp
Jeffrey M. Nelson, Esquire
J. David Black, Esquire
(all via electronic mail and U.S. First Class Mail w/enclosures)

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2017-__-E

IN RE:

Joint Petition of Berkeley Electric Cooperative, Inc. and South Carolina Electric & Gas Company for the Reassignment of Territory in Dorchester County and Approval of an Agreement to Limit Corridor Rights

JOINT PETITION FOR REASSIGNMENT
OF TERRITORY

Berkeley Electric Cooperative, Inc. ("Berkeley") and South Carolina Electric & Gas Company ("SCE&G") (collectively, the "Petitioners") hereby jointly petition the Public Service Commission of South Carolina (the "Commission") for reassignment of certain territory in Dorchester County, South Carolina, and approval of an agreement to eliminate "corridor rights" in the specified area. This Joint Petition is made pursuant to The Territorial Assignment Act, S.C. Code Ann. §§ 58-27-610 to -690 (2015).

I. Introduction

In support of this Joint Petition, Petitioners allege and show unto the Commission the following:

1. SCE&G is a corporation organized and existing under the laws of the State of South Carolina. Further, SCE&G is, in part, an electrical utility engaged in the generation, transmission, distribution, and sale of electricity to the public for compensation. SCE&G's retail electric operations are subject to the jurisdiction of the Commission. Additionally, SCE&G is an electric supplier as defined by the Territorial Assignment Act. S.C. Code Ann. § 58-27-610(1) (2015).
2. Berkeley is subject to the limited jurisdiction of the Commission as an electric supplier as defined by the Territorial Assignment Act. S.C. Code Ann. § 58-27-610(1) (2015).
3. The Commission may assign to electric suppliers areas outside the corporate limits of municipalities and that are more than 300 feet from the lines of electric suppliers. S.C. Code Ann. § 58-27-640 (2015).

4. Upon agreement of the affected electric suppliers, the Commission may reassign portions of previously assigned service areas. S.C. Code Ann. § 58-27-650(A) (2015).

5. The Commission has the authority to approve agreements between electric suppliers concerning corridor rights. The Commission shall approve those agreements if, after giving notice and an opportunity for hearing to interested parties, it finds the agreements to be fair and reasonable. S.C. Code Ann. § 58-27-620(8) (2015).

6. The Commission has previously exercised its statutory authority and assigned electric service territories within Dorchester County, South Carolina, to Berkeley and SCE&G.

7. The herein proposed reassignment of territories among the Petitioners will not cause any existing residential customers to change their service; that is, no existing residential customers will be affected by the Joint Petition.¹

II. Request to Reassign Territory in Dorchester County

8. **Exhibit 1**, attached to this Petition and incorporated herein by reference, depicts the present and proposed assignment of territories in the affected portions of Dorchester County. **Exhibit 1** is the result of lengthy good faith negotiations between Berkeley and SCE&G to re-assign various territories within Dorchester County. The characteristics of the **Exhibit 1** are as follows:

- a. On **Exhibit 1**, territory shaded in light green is presently assigned to Berkeley.
- b. On **Exhibit 1**, territory that is shaded in light red is presently assigned to SCE&G.
- c. On **Exhibit 1**, territory that is shaded in dark red is presently assigned to Berkeley, but the Petitioners request that the territory hereafter be reassigned to SCE&G.
- d. On **Exhibit 1**, territory that is shaded in dark blue is presently assigned to Berkeley, but service to that territory is provided by SCE&G via corridor rights. Petitions request that the territory hereafter be reassigned to SCE&G.

9. The territory shaded in dark red and dark blue represents a single existing phase of a subdivision that has requested single phase underground service. Providing reliable underground electric service requires a loop with two independent connections to

¹ Such reassignment may affect provision of electric service to developers during construction of the homes in the reassigned territories. However, Petitioners have notified the developers of the reassignment, and no developers expressed any objection.

the existing utility infrastructure. If the territories shaded dark red and dark blue continue to be served independently by Berkeley and SCE&G respectively, two loops—one loop for the territory shaded dark red and another for the territory shaded dark blue—would be required to provide underground electric service to the subdivision, whereas the proposed reassignment will require only one loop to provide underground electric service to the subdivision. Each utility installing a loop separately would create inefficiency and duplication in the design, as well as additional access challenges for future maintenance and outage repairs. Moreover, by cutting the number of connections to the existing infrastructure in half (from 4 to 2), the proposed reassignment reduces the exposure to lightning, wildlife or material failures that cause outages.

10. Petitioners respectfully request that the Commission reassign the above detailed portion of Dorchester County in accordance with the Petitioners' negotiated agreement.

III. Agreement to Limit Corridor Rights in Specified Areas

11. Berkeley owns distribution lines that establish "corridor rights" within the territories shaded in dark red and dark blue on **Exhibit 1**; therefore, by virtue of those corridor rights, Berkeley would be able to serve new customers located in territory assigned to another. However, in order to avoid wasteful duplication of electric distribution lines and appurtenant facilities and to better operate their distribution systems safely, Berkeley has agreed that they will abandon said corridor rights and not assert a corridor right to serve a customer within the territory assigned to SCE&G as set forth in the above paragraphs 8 and 10.

12. Petitioners allege that no facilities or territories of any other electric suppliers are affected by the changes Petitioners propose herein.

13. Petitioners allege that each is fully capable of furnishing adequate and dependable electric service in the areas that each now serves and would serve upon the Commission's granting of this Petition.

14. Petitioners have considered the public convenience and necessity in their negotiations and believe the reassignment of the above detailed territories are in the public interest and assert that the Commission's approval of this Petition will be in the public interest. By making the assignments of territory in the manner described in this Petition, Berkeley and SCE&G have given careful consideration to system economy, service reliability and good utility practice, efficiency and safety – all of which support a finding that the assignment of territory set forth herein promotes public convenience and necessity. Moreover, the reassignment of these territories will avoid the duplication of utility facilities in these areas.

15. Petitioners respectfully request that the Commission determine this matter solely on the basis of this filing unless there are protests or petitions to intervene, and in that event, to set this matter for hearing and determination at the earliest possible date.

WHEREFORE, Berkeley Electric Cooperative Inc. and South Carolina Electric & Gas Company, having jointly made petition to the Commission, pray that the Commission issue its order:

1. Accepting this Petition as filed;
2. Finding and Determining that the territorial reassignments as set forth in Paragraphs 8 through 15 are in accordance with the public convenience and necessity;
3. Reassigning to SCE&G the territories detailed in the attached exhibits and described above;
4. Approving the agreement among Petitioners wherein Berkeley has agreed not to assert corridor rights within the territory reassigned to SCE&G in the area described in Paragraph 8 above.
5. Amending the territorial assignment maps to reflect the reassignments requested herein.

Respectfully Submitted,



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 Electric & Gas Company



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 Email: dblack@nexsenpruet.com
 Attorneys for Petitioner Berkeley Electric
 Cooperative, Inc.

October 3, 2017

STATE OF SOUTH CAROLINA)
)
 COUNTY OF LEXINGTON)

VERIFICATION

Personally appeared before me W. Keller Kissam who, being duly sworn, deposes and says that he is Senior Vice President of SCANA Corporation and President of Retail Operations of the Petitioner, South Carolina Electric & Gas Company; that he has read the foregoing Joint Petition and the matters alleged therein are true and correct to the best of his knowledge, information and belief based upon his personal knowledge and his review of the corporate records of South Carolina Electric & Gas Company related to the matters alleged in the Joint Petition; and that he is fully authorized to verify the contents of the Joint Petition on behalf of South Carolina Electric & Gas Company.

Sworn to before me this
3rd day of October, 2017

W. Keller Kissam
 W. Keller Kissam


Margaret Mathias
 Notary Public for South Carolina
 My Commission Expires: July 14, 2019

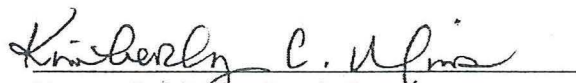
STATE OF SOUTH CAROLINA)
)
 COUNTY OF BERKELEY)

VERIFICATION

Personally appeared before me Dwayne Cartwright who, being duly sworn, deposes and says that he is the Chief Executive Officer of the Petitioner, Berkeley Electric Cooperative, Inc.; that he has read the foregoing Joint Petition and the matters alleged therein are true and correct to the best of his knowledge, information and belief based upon his personal knowledge and his review of the corporate records of Berkeley Electric Cooperative, Inc. related to the matters alleged in the Joint Petition; and that he is fully authorized to verify the contents of the Joint Petition on behalf of Berkeley Electric Cooperative, Inc.

Sworn to before me this
3 day of October, 2017


 Dwayne Cartwright


 Notary Public for South Carolina
 My Commission Expires: 8/28/18

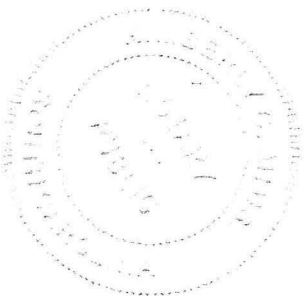


EXHIBIT 1



Berkeley Electric Cooperative
Your Touchstone Energy® Cooperative

P.O. Box 1234
Moncks Corner, SC 29461
Phone : 843-761-8200

NOTES

Berkeley Electric Cooperative makes no warranty, representation, or guarantee as to the content, sequence, accuracy, timeliness, or completeness of any information provided herein or derived from the mapping data for any reason. Berkeley Electric Cooperative explicitly disclaims any representations and warranties, including, without limitation, the implied warranties of merchantability and fitness for a particular purpose. The user knowingly waives any and all claims for damages against any and all of the entities comprising Berkeley Electric Cooperative that may arise from the mapping data.



GIS & MAPPING DEPT

Drawn By: *jasont*
Project/File Name: *ServiceTerritoryChanges_62217*
Date: *6/23/2017*

Sheet No.
1

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2017-__-E

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Joint Petition of Berkeley Electric)
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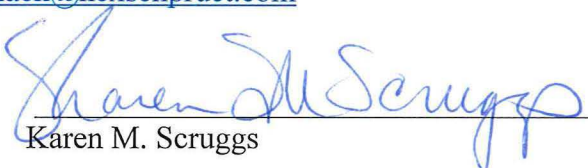
**CERTIFICATE OF
SERVICE**

This is to certify that I have caused to be served this day one (1) copy of the **Joint Petition for Reassignment of Territory** via electronic mail and U.S. First Class Mail to the persons named below at the addresses set forth:

Dawn Hipp
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
dhipp@regstaff.sc.gov

Jeffrey M. Nelson, Esquire
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1230 Main Street, Suite 900
Columbia, SC 29201
dblack@nexsenpruet.com



Karen M. Scruggs

Cayce, South Carolina

This 3rd day of October 2017